



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TREASURY
LANSING

NICK A. KHOURI
STATE TREASURER

October 8, 2018

**Preliminary Review of Underfunded Status
And Notice of Delinquency**

Fiscal Year: 2018

Municipality Code: 227510

Sent Via Email

Kingsford City Housing Commission
imhc@imhc.us

RE: Retirement System Annual Report

Dear Administrative Officer or Designee:

Based on our records we have not received your fiscal year 2018 *Retirement System Annual Report* (Form 5572) pursuant to Public Act 202 of 2017 (the Act). Because the required form has not yet been submitted, you are receiving this letter regarding the preliminary review of underfunded status. This report is required annually. Sec. 5(6) of Public Act 202 of 2017 (the Act) states, "A local unit of government shall electronically submit a report [Local Government Retirement System Annual Report (Form No. 5572)] in a form prescribed by the department of treasury on an annual basis to the governing body of the local unit of government and the Department of Treasury no later than six (6) months after the end of the local unit of government's fiscal year."

If you believe your unit meets the requirements to be considered funded under the Act, we will still allow you to submit your Form 5572 within the next 30 days. Unless you submit your Form 5572 within 30 days, your local unit of government will receive a determination of underfunded status which will result in additional reporting.

Next Steps: If you receive a Determination of Underfunded Status

- Treasury will provide a notification to the local unit of government detailing the determination of underfunded status. Within this notification Treasury will also request a corrective action plan for the Municipal Stability Board (the Board) to review.

- After receipt of notification from Treasury, the underfunded local unit shall develop and submit to the Board for approval a corrective action plan for the local unit of government. The local unit of government is responsible for determining the components of the corrective action plan. The governing body of the local unit of government must approve the corrective action plan before submission to the Board.
- The corrective action plan must be submitted to the Board within 180 days after the determination of underfunded status.
- The Board must approve or reject a corrective action plan within 45 days after it is submitted.

If you have any questions, please email our office at LocalRetirementReporting@michigan.gov or visit Michigan.gov/LocalRetirementReporting for step-by-step reporting instructions and helpful FAQs.

Sincerely,

Michigan Department of Treasury
Local Retirement Reporting Team

Jeanne Shaltz

From: Lynn Mott <lynn.mott@andersontackman.com>
Sent: Tuesday, May 21, 2019 1:46 PM
To: Imhc
Subject: Re: 227510 2018 Retirement System Corrective Action Plan - Determination of Noncompliance
Attachments: Attachment 6a.xlsx; Attachment - 1.pdf; Attachment 2a.xlsx
Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jeanne,

I have no clue why you are still getting this as we have done this before for them. I have completed a new 5598 and added additional documentation. You will need to bring this to your Board for approval and attach that approval at item Attachment 1a when you send all of this to the state.

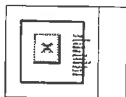
Thanks,

Lynn

Lynn M. Mott, MSA | Staff Accountant

(T) 906 774-4300 ext. 23

(E) lynn.mott@andersontackman.com



Anderson Tackman & Company, PLC
Certified Public Accountants

On Tue, May 21, 2019 at 1:32 PM Imhc <imhc@imhc.us> wrote:

Dear Lynn

Why am I still getting this? Are you going to take care of this or do I? Confused as usual Jeanne.

Sent from my iPhone

Begin forwarded message:

From: LocalRetirementReporting <LocalRetirementReporting@michigan.gov>
Date: May 21, 2019 at 12:49:04 PM CDT
To: "imhc@imhc.us" <imhc@imhc.us>
Subject: 227510 2018 Retirement System Corrective Action Plan - Determination of Noncompliance

Please see the attached cover letter regarding the Determination of Noncompliance:

Public Act 202 of 2017 Pension Report

Enter Local Unit Name	Kingford Housing Commission
Enter Six-Digit Municode	227510
Fiscal Year (four-digit year only, e.g. 2017)	2017
Contact Name (Chief Financial Officer)	Jeanne Allard-Shultz
Title if not CFO	Executive Director
Contact Email Address	jmh@lmhc.us
Contact Telephone Number	906-774-2771

Instructions/Questions: For a list of detailed instructions on how to complete and submit this form, visit michigan.gov/localRetirementReporting. For questions, please email localRetirementReporting@michigan.gov. Return this original Excel file. Do not submit a scanned image or PDF.

Line	Description	Source of Data	Statute Reference	Plan 1	Plan 2	Plan 3	Plan 4	Plan 5
1	Provide the name of your retirement pension system	Most Recent Actuarial Valuation Report	Sec. 5(4)	MERS				
2	Enter retirement pension system's assets (plan fiduciary net position ending)	Most Recent Audit Report	Sec. 5(4)(b)	348,884				
3	Enter retirement pension system's liabilities (total pension liability ending)	Most Recent Audit Report	Sec. 5(4)(b)	559,842				
4	Date (plan year ending) of valuation of system's assets and liabilities (e.g. 12/31/2016)	Most Recent Audit Report	Sec. 5(6)	12/31/16				
5	Actuarially Determined Contribution (ADC)	Most Recent Audit Report	Sec. 5(4)(b)	15,708				
6	Governmental Fund Revenues	Most Recent Audit Report	Sec. 5(4)(b)	386,981				
7	Pension Trigger Summary							
8	Is this unit a primary unit (County, Township, City, Village)?	From Municode		NO	NO	NO	NO	NO
9	Funded ratio	Calculated	Sec. 5(4)(b)	62.3%				
10	All plans combined ADC/Governmental fund revenues	Calculated	Sec. 5(4)(b)	4.1%	0.0%	0.0%	0.0%	0.0%
11	Does this plan trigger "underfunded status" as defined by PA 202 of 2017?	Primary unit triggers: Less than 60% funded AND greater than 10% ADC/Governmental fund revenues. Non-Primary unit triggers: Less than 60% funded	Sec. 5(4)(b)	NO	NO	NO	NO	NO

By emailing this report to the Michigan Department of Treasury, the local unit of government acknowledges that these statements are complete and accurate in all known respects. Act 202 of 2017 also requires the local unit of government to electronically submit the report to its governing body.

Protecting Local Government Retirement and Benefits Act Corrective Action Plan:

Defined Benefit Pension Retirement Systems

Issued under authority of Public Act 202 of 2017.

1. MUNICIPALITY INFORMATION

Local Unit Name: Kingsford Housing Commission Six-Digit Muni Code: 227510
Defined Benefit Pension System Name: MERS
Contact Name (Administrative Officer): Jeanne Allard-Shaltz
Title if not Administrative Officer: Executive Director
Email: imhc@imhc.us Telephone: (906) 774-2771

2. GENERAL INFORMATION

Corrective Action Plan: An underfunded local unit of government shall develop and submit for approval a corrective action plan for the local unit of government. The local unit of government shall determine the components of the corrective action plan. This Corrective Action Plan shall be submitted by any local unit of government with at least one defined benefit pension retirement system that has been determined to have an underfunded status. Underfunded status for a defined benefit pension system is defined as being less than 60% funded according to the most recent audited financial statements, and, if the local unit of government is a city, village, township, or county, the annually required contribution (ARC) for all of the defined benefit pension retirement systems of the local unit of government is greater than 10% of the local unit of government's annual governmental fund revenues, based on the most recent fiscal year.

Due Date: The local unit of government has **180 days from the date of notification** to submit a corrective action plan to the Municipal Stability Board (the Board). The Board may extend the 180-day deadline by up to an additional 45 days if the local unit of government submits a reasonable draft of a corrective action plan and requests an extension.

Filing: Per Sec. 10(1) of PA 202 of 2017 (the Act), this Corrective Action Plan must be approved by the local government's administrative officer and its governing body. **You must provide proof of your governing body approving this Corrective Action Plan and attach the documentation as a separate PDF document.** Per Sec. 10(4) of the Act, failure to provide documentation that demonstrates approval from your governing body will result in a determination of noncompliance by the Board.

The submitted plan must demonstrate through distinct supporting documentation how and when the local unit will reach the 60% funded ratio. Or, if the local unit is a city, village, township, or county, the submitted plan may demonstrate how and when the ARC for all of the defined benefit pension systems will be less than 10% of annual governmental fund revenues, as defined by the Act. Supporting documentation for the funding ratio and/or ARC must include an actuarial projection, an actuarial valuation, or an internally developed analysis. The local unit must project governmental fund revenues using a reasonable forecast based on historical trends and projected rates of inflation.

The completed plan must be submitted via email to Treasury at LocalRetirementReporting@michigan.gov for review by the Board. **If you have multiple underfunded retirement systems, you are required to complete separate plans and send a separate email for each underfunded system.** Please attach each plan as a separate PDF document in addition to all applicable supporting documentation.

The subject line of the email(s) should be in the following format: **Corrective Action Plan-2017, Local Unit Name, Retirement System Name** (e.g. Corrective Action Plan-2017, City of Lansing, Employees' Retirement System)

Pension Plan). Treasury will send an automatic reply acknowledging receipt of the email. Your individual email settings must allow for receipt of Treasury's automatic reply. This will be the only notification confirming receipt of the application(s).

Municipal Stability Board: The Municipal Stability Board (the Board) shall review and vote on the approval of a corrective action plan submitted by a local unit of government. If a corrective action plan is approved, the Board will monitor the corrective action plan for the following two years, and the Board will report on the local unit of government's compliance with the Act not less than every two years.

Review Process: Following receipt of the email by Treasury, the Board will accept the corrective action plan submission at the next scheduled meeting of the Board. The Board shall then approve or reject the corrective action plan within 45 days from the date of the meeting.

Considerations for Approval: A successful corrective action plan will demonstrate the actions for correcting underfunded status as set forth in Sec. 10(7) of the Act (listed below), as well as any additional solutions to address the underfunded status. Please also include steps already taken to address your underfunded status as well as the date prospective actions will be taken. A local unit of government may also include in its corrective action plan, a review of the local unit of government's budget and finances to determine any alternative methods available to address its underfunded status. A corrective action plan under this section may include the development and implementation of corrective options for the local unit of government to address its underfunded status. The corrective options as described in Sec. 10(7) may include, but are not limited to, any of the following:

- (i) Closing the current defined benefit plan.
- (ii) Implementing a multiplier limit.
- (iii) Reducing or eliminating new accrued benefits.
- (iv) Implementing final average compensation standards.

Implementation: The local unit of government has up to 180 days after the approval of a corrective action plan to begin to implement the corrective action plan to address its underfunded status. The Board shall monitor each underfunded local unit of government's compliance with this act and any corrective action plan. The Board shall adopt a schedule, not less than every 2 years, to certify that the underfunded local unit of government is in substantial compliance with the Act. If the Board determines that an underfunded local unit of government is not in substantial compliance under this subsection, the Board shall within 15 days provide notification and report to the local unit of government detailing the reasons for the determination of noncompliance with the corrective action plan. The local unit of government has 60 days from the date of the notification to address the determination of noncompliance.

3. DESCRIPTIONS OF PRIOR ACTIONS

Prior actions are separated into three categories below: System Design Changes, Additional Funding, and Other Considerations. Please provide a brief description of the prior actions implemented by the local government to address the retirement system's underfunded status within the appropriate category section. Within each category are sample statements that you may choose to use to indicate the changes to your system that will positively affect your funded status. For retirement systems that have multiple divisions, departments, or plans within the same retirement system, please indicate how these changes impact the retirement **system** as a whole.

- **Please Note:** If applicable, prior actions listed within your waiver application(s) may also be included in your corrective action plan.

Please indicate where in the attached supporting documentation these changes are described and the impact of those changes (i.e. what has the local unit of government done to improve its underfunded status, and where can we find the proof of these changes in the supporting documentation?).

Note: Please provide the name of the system impacted, the date you made the change, the relevant page number(s) within the supporting documentation, and the resulting change to the system's funded ratio.

Category of Prior Actions:

- ☐ **System Design Changes** - System design changes may include the following: Lower tier of benefits for new hires, final average compensation limitations, freeze future benefit accruals for active employees in the defined benefit system, defined contribution system for new hires, hybrid system for new hires, bridged multiplier for active employees, etc.

Sample Statement: The system's multiplier for current employees was lowered from 2.5X to 2X for the **General Employees' Retirement System** on **January 1, 2017**. On **page 8** of the attached actuarial supplemental valuation, it shows our funded ratio will be **60%** by fiscal year **2020**.

- ☐ **Additional Funding** - Additional funding may include the following: Voluntary contributions above the actuarially determined contribution, bonding, millage increases, restricted funds, etc.

Sample Statement: The local unit provided a lump sum payment of **\$1 million** to the **General Employees' Retirement System** on **January 1, 2017**. This lump sum payment was in addition to the actuarially determined contribution (ADC) of the system. The additional contribution will increase the retirement system's funded ratio to **61% by 2025**. Please see **page 10** of the attached enacted budget, which highlights this contribution of **\$1 million**.

- ☒ **Other Considerations** - Other considerations may include the following: outdated Form 5572 information, actuarial assumption changes, amortization policy changes, etc.

Sample Statement: The information provided on the Form 5572 from the audit used actuarial data from **2015**. Attached is an updated actuarial valuation for **2017** that shows our funded ratio has improved to **62%** as indicated on **page 13**.

As per the attached 2017 Form 5572 (attachment 7a), Kingsford Housing Commission is not in an underfunded status. This Form was submitted to the Treasury on March 6, 2018 as per the attached email (attachment 7b). No further action deemed necessary.

4. DESCRIPTION OF PROSPECTIVE ACTIONS

The corrective action plan allows you to submit a plan of prospective actions which are separated into three categories below: System Design Changes, Additional Funding, and Other Considerations. Please provide a brief description of the additional actions the local government is planning to implement to address the retirement system's underfunded status within the appropriate category section. Within each category are sample statements that you may choose to use to indicate the changes to your system that will positively affect your funded status. For retirement systems that have multiple divisions, departments, or plans within the same retirement system, please indicate how these changes impact the retirement **system** as a whole.

Please indicate where in the attached supporting documentation these changes are described and the impact of those changes (i.e. what will the local unit of government do to improve its underfunded status, and where can we find the proof of these changes in the supporting documentation?).

Category of Prospective Actions:

- ☐ **System Design Changes** - System design changes may include the following: Lower tier of benefits for new hires, final average compensation limitations, freeze future benefit accruals for active employees in the defined benefit system, defined contribution system for new hires, hybrid system for new hires, bridged multiplier for active employees, etc.

Sample Statement: Beginning with **summer 2018** contract negotiations, the local unit will seek to lower the system's multiplier for current employees from 2.5X to 2X for the **General Employees' Retirement System**. On page 8 of the attached actuarial supplemental valuation, it shows our funded ratio would be **60% funded by fiscal year 2020** if these changes were adopted and implemented by **fiscal year 2019**.

- ☐ **Additional Funding** – Additional funding may include the following: voluntary contributions above the actuarially determined contribution, bonding, millage increases, restricted funds, etc.

Sample Statement: Beginning in **fiscal year 2019**, the local unit will provide a lump sum payment of **\$1 million** to the **General Employees' Retirement System**. This lump sum payment will be in addition to the actuarially determined contribution (ADC) of the system. The additional contribution will increase the retirement system's funded ratio to **61% by 2025**. Please see page 10 of the attached enacted budget, which highlights this contribution of **\$1 million**. Please see page 12 of the attached supplemental actuarial valuation showing the projected change to the system's funded ratio with this additional contribution.

- ☐ **Other Considerations** – Other considerations may include the following: outdated Form 5572 information, actuarial assumption changes, amortization policy changes, etc.

Sample Statement: Beginning in **fiscal year 2019**, the local unit will begin amortizing the unfunded portion of the pension liability using a **level-dollar amortization method over a closed period of 10 years**. This will allow the retirement system to reach a funded status of **62% by 2022** as shown in the attached actuarial analysis on page 13.

5. CONFIRMATION OF FUNDING

Please check the applicable answer:

Do the corrective actions listed in this plan allow for (insert local unit name) Kingsford Housing Commission to make, at a minimum, the annual required contribution payment for the defined benefit pension system according to your long-term budget forecast?

☒ Yes

☐ No

If No, Explain

6. DOCUMENTATION ATTACHED TO THIS CORRECTIVE ACTION PLAN

Documentation should be attached as a .pdf to this Corrective Action Plan. The documentation should detail the corrective action plan that would be implemented to adequately address the local unit of government's underfunded status. Please check all documents that are included as part of this plan and attach in successive order as provided below:

Naming convention: when attaching documents please use the naming convention shown below. If there is more than one document in a specific category that needs to be submitted, include a, b, or c for each document. For example, if you are submitting two supplemental valuations, you would name the first document "Attachment 2a" and the second document "Attachment 2b".

Naming Convention

☒ Attachment – 1

☒ Attachment – 1a

☒ Attachment – 2a

☐ Attachment – 3a

☐ Attachment – 4a

☐ Attachment – 5a

☒ Attachment –6a

Type of Document

This Corrective Action Plan Form (Required)

Documentation from the governing body approving this Corrective Action Plan (Required)

An actuarial projection, an actuarial valuation, or an internally developed analysis, which illustrates how and when the local unit will reach the 60% funded ratio. Or, if the local unit is a city, village, township, or county, ARC will be less than 10% of governmental fund revenues, as defined by the Act. (Required)

Documentation of additional payments in past years that is not reflected in your audited financial statements (e.g. enacted budget, system provided information).

Documentation of commitment to additional payments in future years (e.g. resolution, ordinance)

A separate corrective action plan that the local unit has approved to address its underfunded status, which includes documentation of prior actions, prospective actions, and the positive impact on the system's funded ratio

Other documentation not categorized above

7. CORRECTIVE ACTION PLAN CRITERIA

Please confirm that each of the four corrective action plan criteria listed below have been satisfied when submitting this document. Specific detail on corrective action plan criteria can be found in the Corrective Action Plan Development: Best Practices and Strategies document.

Corrective Action Plan Criteria	Description
<input checked="" type="checkbox"/> Underfunded Status	Is there a description and adequate supporting documentation of how and when the retirement system will reach the 60% funded ratio? Or, if your local unit is a city, village, township, or county, how and when the ARC of all pension systems will be less than 10 percent of governmental fund revenues?
<input checked="" type="checkbox"/> Reasonable Timeframe	Do the corrective actions address the underfunded status in a reasonable timeframe (<u>see CAP criteria issued by the Board</u>)?
<input checked="" type="checkbox"/> Legal and Feasible	Does the corrective action plan follow all applicable laws? Are all required administrative certifications and governing body approvals included? Are the actions listed feasible?
<input checked="" type="checkbox"/> Affordability	Do the corrective action(s) listed allow the local unit to make the annual required contribution payment for the pension system now and into the future without additional changes to this corrective action plan?

8. LOCAL UNIT OF GOVERNMENT'S ADMINISTRATIVE OFFICER APPROVAL OF CORRECTIVE ACTION PLAN

I Jeanne Allard-Shaltz, as the government's administrative officer (*enter title*) Executive Director (Ex: City/Township Manager, Executive director, and Chief Executive Officer, etc.) approve this Corrective Action Plan and will implement the prospective actions contained in this Corrective Action Plan.

I confirm to the best of my knowledge that because of the changes listed above, one of the following statements will occur:

- ☒ The MERS (**Insert Retirement Pension System Name**) will achieve a funded status of at least 60% by Fiscal Year 2018 as demonstrated by required supporting documentation listed in section 6.

OR, if the local unit is a city, village, township, or county:

- ☐ The ARC for all of the defined benefit pension retirement systems of _____ (**Insert local unit name**) will be less than 10% of the local unit of government's annual governmental fund revenues by Fiscal Year _____ as demonstrated by required supporting documentation listed in section 6.

Signature

Jeanne Allard-Shaltz

Date

6/19/19

Public Act 202 of 2017 Pension Report

Enter Local Unit Name	Kingsford Housing Commission
Enter Six-Digit Municode	227510
Unit Type	Authority
Fiscal Year (four-digit year only, e.g. 2017)	2018
Contact Name (Chief Administrative Officer)	Jeanne Allard-Schaltz
Title if not CAO	Executive Director
CAO (or designee) Email Address	director@kingsfordhousing.org
Contact Telephone Number	906-774-2771

Instructions/Questions: For a list of detailed instructions on how to complete and submit this form, visit michigan.gov/LocalRetirementReporting. For questions, please email LocalRetirementReporting@michigan.gov. **Return this original Excel file. Do not submit a scanned image or PDF.**

Pension System Name (not division) 1	MERS
Pension System Name (not division) 2	
Pension System Name (not division) 3	
Pension System Name (not division) 4	
Pension System Name (not division) 5	

If your pension system is separated by divisions, you would only enter one system. For example, one could have different divisions of the same system for union and non-union employees. However, these would be only one system and should be reported as such on this form.

Line	Description	Source of Data	Statute Reference	System 1	System 2	System 3	System 4	System 5
1	Provide the name of your retirement pension system	Most Recent Actuarial Valuation Report	Sec. 5(6)	MERS				
2	Enter retirement pension system's assets (system fiduciary net position ending)	Most Recent Audit Report	Sec. 5(4)(b)	359,700				
3	Enter retirement pension system's liabilities (total pension liability ending)	Most Recent Audit Report	Sec. 5(4)(b)	561,379				
4	Date (system year ending) of valuation of system's assets and liabilities (e.g. 12/31/2016)	Most Recent Audit Report	Sec. 5(6)	12/31/17				
5	Actuarially Determined Contribution (ADC)	Most Recent Audit Report	Sec. 5(4)(b)	17,952				
6	Governmental Fund Revenues	Most Recent Audit Report	Sec. 5(4)(b)	470,415				
7	Pension Trigger Summary							
8	Is this unit a primary unit (County, Township, City, Village)?	From Municode		NO	NO	NO	NO	NO
9	Funded ratio	Calculated	Sec. 5(4)(b)	64.1%				
10	All systems combined ADC/Governmental fund revenues	Calculated	Sec. 5(4)(b)	3.8%	0.0%	0.0%	0.0%	0.0%
11	Does this system trigger "underfunded status" as defined by PA 202 of 2017?	Primary units trigger: Less than 60% funded AND greater than 10% ADC/Governmental fund revenues. Non-Primary units trigger: Less than 60% funded	Sec. 5(4)(b)	NO	NO	NO	NO	NO

By emailing this report to the Michigan Department of Treasury, the local unit of government acknowledges that this report is complete and accurate in all known respects. Act 202 of 2017 also requires the local unit of government to electronically submit the report to its governing body.

Kingsford Housing Commission
1025 Woodward Ave.
Kingsford, MI 49802

Minutes of the regular meeting of the KINGSFORD HOUSING COMMISSION held on Wednesday June 19, 2019 at 9:00 am - Kingswood was called to order by Commissioner Hagberg.

PRESENT: Hagberg, Chumney, St. Louis (3)

ABSENT: Schultz, Schiavo (2)

ADDITIONAL PRESENT: (0)

Declaring a quorum Commissioner Hagberg opened this meeting.

Moved by Comm. Chumney, 2nd by Comm. St. Louis and unanimously approved the minutes from the meeting held on Wednesday, May 15, 2019.

Moved by Comm. St Louis 2nd by Comm. Chumney and unanimously approved the following Financial Report filed for audit for June 17, 2019.

FINANCIAL REPORT

June 19, 2019

Cash on hand - checking – FNB	\$ 57,533.41
Cash on hand - rents. etc.	\$ 3,688.00
Cash on hand - petty cash	\$ 46.50
TOTAL CASH ON HAND	\$ 61,267.91

INVESTED FUNDS:

First National Bank – money market acct.	\$ 162,627.89
River Valley - Money Market	\$ 200,927.35

TOTAL INVEST FUNDS:	\$ 363,555.24
TOTAL ALL FUNDS	\$ 424,823.15

SUMMARY OF FUNDS LOCATION

Cash on hand	\$ 3,734.50
First National Bank - checking	\$ 79,511.38
River Valley – money market acct	\$ 200,927.35
FNB – money market acct.	\$ 162,627.89

TOTAL ALL FUNDS SUMMARY	\$424,823.15
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Motion by Comm. Chumney 2nd by Comm. St. Louis and unanimously approved the bills for the 1st and 2nd half of May 2019 and 1st half of June 2019.

Jeanne K. Allard-Shaltz, PHM - Executive Director's report: Followed by a discussion.

Motion by Comm St. Louis and 2nd by Comm Chumney and unanimously approved the request for Anderson Tackman to complete the fiscal year end 2019 audit.

X Motion by Comm St. Louis and 2nd by Comm Chumney and unanimously approved the request for the submission of Form 5572 -- re: MERS.

This regular meeting of the **Kingsford Housing Commission** adjourned at approximately 9:10 am at Kingswood.

Jeanne K. Allard/Shaltz, PHM
Executive Director

JAS:jc

Cc: Commissioners (5)

City of Kingsford (1)